

EXHIBIT “A”

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X Filed: _____
SONTAYA A. BELTON,

Plaintiff,

-against-

INDEX NO.

Plaintiff designates Bronx
County as the place of trial.

JB HUNT TRANSPORT INC and RICHARD RIOS,

S U M M O N S

Defendants.

The basis of venue is
Location of accident


-----X

To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service of this summons, or within 30 days after service of this summons is complete if this summons is not personally delivered to you within the State of New York.

In case of your failure to answer this summons, a judgment by default will be taken against you for the relief demanded in the complaint, together with the costs of this action.

Dated: New York, New York
January 24, 2022


LEAV & STEINBERG, L.L.P.
Attorneys for Plaintiff
75 Broad Street, Suite 1601
New York, New York 10004
(212) 766-5222

SEE RIDER ATTACHED

JB HUNT TRANSPORT INC
9200 E. 146th Street
Noblesville, IN 46060

RICHARD RIOS
52 Vadnais Street
Springfield, MA 01104

PLEASE FORWARD TO YOUR INSURANCE COMPANY

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X INDEX NO.
SONTAYA A. BELTON,

Plaintiff,

VERIFIED COMPLAINT

-against-

JB HUNT TRANSPORT INC and RICHARD RIOS,

Defendants.
-----X

Plaintiff, by her attorneys, LEAV & STEINBERG, L.L.P., as and for her Verified
Complaint, respectfully alleges, upon information and belief:

1. The plaintiff, SONTAYA A. BELTON, at all times herein mentioned was and
still is a resident of the County of Bronx and State of New York.

2. Defendant JB HUNT TRANSPORT INC, at all times herein mentioned, was and
still is a domestic business corporation organized and existing under the laws of the State of
Indiana.

3. Defendant, at all times herein mentioned, JB HUNT TRANSPORT INC,
conducted and carried on business in the County of Hamilton and the State of Indiana.

4. At all times herein mentioned defendant JB HUNT TRANSPORT INC transacted
business within the State of New York.

5. At all times herein mentioned defendant JB HUNT TRANSPORT INC expected
or should reasonably have expected its acts to have consequences in the State of New York.

6. The defendant, RICHARD RIOS, at all times herein mentioned, was and still is a
resident of the County of Hampden and State of Massachusetts.

7. On or about November 23, 2021, defendant JB HUNT TRANSPORT INC, was
the registered owner of a certain 2019 Box Truck, bearing Indiana State license plate number
359062.

8. On or about November 23, 2021, defendant JB HUNT TRANSPORT INC, was

the titled owner of a certain 2019 Box Truck, bearing Indiana State license plate number 359062.

9. On or about November 23, 2021, defendant JB HUNT TRANSPORT INC, was the lessee of a certain 2019 Box Truck, bearing Indiana State license plate number 359062.

10. On or about November 23, 2021, defendant JB HUNT TRANSPORT INC, was the lessor of a certain 2019 Box Truck, bearing Indiana State license plate number 359062.

11. On or about November 23, 2021, defendant JB HUNT TRANSPORT INC, maintained a certain 2019 Box Truck, bearing Indiana State license plate number 359062.

12. On or about November 23, 2021, defendant JB HUNT TRANSPORT INC, controlled a certain 2019 Box Truck, bearing Indiana license plate number 359062.

13. On or about November 23, 2021, defendant RICHARD RIOS, was the operator of a certain 2019 Box Truck, bearing Indiana State license plate number 359062.

14. On or about November 23, 2021, the 2019 Box Truck, bearing Indiana State license plate number 359062 was being operated by defendant RICHARD RIOS with the express knowledge, authority, permission and consent of the owner of said vehicle, defendant JB HUNT TRANSPORT INC.

15. On or about November 23, 2021, defendant RICHARD RIOS, maintained a certain 2019 Box Truck, bearing Indiana State license plate number 359062.

16. On or about November 23, 2021, defendant RICHARD RIOS, controlled a certain 2019 Box Truck, bearing Indiana State license plate number 359062.

17. That at all times herein mentioned, northbound on the I87 Major Deegan Expressway at or near its intersection with East 161st Street was and still is a public roadway and/or thoroughfare in the County of Bronx and State of New York.

18. On or about November 23, 2021, plaintiff SONTAYA A. BELTON was the operator of a certain automobile, bearing license plate number KLK2283.

19. On November 23, 2021, the vehicle owned by defendant JB HUNT TRANSPORT INC and operated by defendant RICHARD RIOS came into contact with the vehicle operated by plaintiff SONTAYA A. BELTON, at or near the intersection of I87 Major

Deegan Expressway and East 161st Street, in the County of Bronx and State of New York.

20. Solely as a result of the defendants' negligence, carelessness and recklessness, the plaintiff SONTAYA A. BELTON was caused to suffer severe and serious personal injuries to mind and body, and further, that the plaintiff was subjected to great physical pain and mental anguish.

21. The aforesaid occurrence was caused by the negligence of the defendants, without any culpable conduct on the part of the plaintiff SONTAYA A. BELTON.

22. The injuries and damages sustained by plaintiff, SONTAYA A. BELTON and further, the accident which occurred on November 23, 2021, in the manner set forth in his complaint, were caused in whole or in part, by reason of the negligence and culpable conduct of the defendants.

23. By reason of the foregoing, plaintiff SONTAYA A. BELTON sustained injuries to her limbs, body and nervous system and has been rendered sick, sore, lame and disabled and upon information and belief, some of these injuries are permanent; she has been unable to pursue her duties and recreational activities for some time; she has been confined to bed and home for some time; she has been compelled to submit herself to the hospital and medical care and attention and to incur various sums of money in an endeavor to cure or alleviate said injuries and she has been compelled to suffer and continues to suffer physical pain, mental anguish and emotional distress and will sustain a loss of enjoyment, pleasures and pursuits of life.

24. As a result of the foregoing, the plaintiff SONTAYA A. BELTON sustained serious personal injuries as defined in Section 5102(d) of the Insurance Law of the State of New York, and/or economic loss greater than basic economic loss as defined in Section 5102(a) of the Insurance Law of the State of New York.

25. This action falls within one or more of the exceptions set forth in Section 1602 of the Civil Practice Law and Rules.

26. Due to defendants' negligence, plaintiff is entitled to damages in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against defendants in a sum which exceeds the jurisdictional limits of all lower Courts which should otherwise have jurisdiction, and in such sum as a jury may find reasonable, fair and just, together with interest and the costs and disbursements of this action, and such other and further relief as to this Court seems just and proper.

Dated: New York, New York
January 24, 2022



By: Alexander Kran III
LEAV & STEINBERG, L.L.P.
Attorneys for Plaintiff
75 Broad Street, Suite 1601
New York, New York 10004
Tel: (212) 766-5222

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X INDEX NO.
SONTAYA A. BELTON,

Plaintiff,

**ATTORNEY'S
VERIFICATION**

-against-

JB HUNT TRANSPORT INC and RICHARD RIOS,

Defendants.
-----X

Alexander Kran III, an attorney duly admitted to practice law in the State of New York, makes the following affirmation under the penalty of perjury:

I am the firm of LEAV & STEINBERG, L.L.P., the attorneys of record for the plaintiff.

I have read the foregoing Complaint and know the contents thereof; the same is true to my own knowledge except as to the matters therein stated to be alleged on information and belief and that as to those matters, I believe them to be true.

This verification is made by affirmant and not by plaintiff because he is not in the County of New York, which is the County where your affirmant maintains offices.

The grounds of affirmant's belief as to all matters not stated upon affirmant's knowledge are correspondence had with the said plaintiff, information contained in the said plaintiff's file, which is in affirmant's possession, and other pertinent data relating thereto.

Dated: New York, New York
January 24, 2022



Alexander Kran III, Esq.
LEAV & STEINBERG, LLP

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Index No.

SONTAYA A. BELTON,

Plaintiff,

-against-

JB HUNT TRANSPORT INC and RICHARD RIOS,

Defendants.

SUMMONS and VERIFIED COMPLAINT

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